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**Cc:** [Chip Humphrey](#)  
**Subject:** Framework for July 1, 2007  
**Date:** 05/25/2007 01:28 PM

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All,

This email is a follow-up to our discussion at Wednesday's management meeting and responds to statements made at the Senior Manager check-in meeting on May 16, 2007.

In order to complete Round 3B sampling efforts by early in 2008, we need to have general agreement on the necessary data needs by July 1, 2007. Currently, the following elements are under consideration:

**FSPs to address data gaps identified by LWG in Round 2 Data Report:**

- Sediment Bioassays and Chemistry - FSP received May 2, 2007
- Upstream and Downstream Sediment - FSP expected by May 25, 2007
- Nature and Extent Sediment - FSP expected by May 25, 2005

EPA and its government partners expect to have comments on the sediment bioassay and nature and extent sediment FSP sent to the LWG by June 8, 2007. These may not be in the form of traditional comments but rather the rationale for and detailed depiction of the sampling EPA and its partners feel is required to delineate the lateral extent of contamination at the site. Because subsurface data was not evaluated in the Round 2 Data Report and because we just received the nature and extent of contamination FSP, we do not have a timeframe for evaluating the data necessary for delineating the vertical extent of contamination at this time. However, we hope to have some sense of the geographic scope and scale of this effort by July, 1 2007.

In addition, EPA does not have a time frame for reviewing and providing feedback on the upstream sediment FSP. As you are aware, there are significant policy issues surrounding the topic of site boundary and upstream sampling for background determination. In addition, some of the 3A sampling (e.g., sediment trap data) may be useful in this evaluation. While we do not expect to have detailed comments on the upstream and downstream sediment FSP by July 1 2007, we hope to have some sense of the geographic scope and scale of this effort by July, 1 2007.

**Data Gaps Identified by EPA and Government Partners:**

TZW: Risk framework and general scope of data gaps to LWG by June 8, 2007  
Biota Tissue: DQOs and general scope of data gaps to LWG by June 8, 2007

These two elements are our highest priority. EPA recognizes the time critical nature of these data needs. In addition, we recognize that the collection of additional biota tissue represents a significant investment on the part of the LWG and that the collection and evaluation of TZW has significant policy implications. As a result, we should plan on a couple "framework" type meetings on each of these topics in mid-June.

## **Continuation of Round 3A:**

Phase 2 Lamprey Toxicity Testing: We have general agreement on the parameters and watersheds targeted for collection. Once the FSP addendum is received, we can develop a time frame for its review and approval.

Hybrid Fate and Transport Model: Model write-up to EPA by June 22, 2007

Stormwater: Need evaluation of work remaining to complete sampling objectives and decision on when to terminate the sampling effort and/or continuing the sampling in the fall of 2007.

EPA understands that these elements are moving forward and are not part of the July 1, 2007 package.

## **Other Potential Data Gaps**

Riparian Soil - Likely and upland data gap.

Groundwater Seeps - Likely an upland data gap

Bird eggs - Further discussion required

Other potential data gaps based on Round 3A results (e.g., Upstream data collected in vicinity of Cargill and/or Historic MGP, Round 3A lamprey tissue data, Round 2B mussel tissue data, high flow surface water data, 1st quarter sediment trap data).

These elements have not been discussed in any detail. However, in the interest of completeness (i.e., full data needs to complete the RI/FS) we wanted to identify some potential data needs. EPA believes that data efforts will be small in scope and scale and may be addressed through other vehicles - for example, government provides resources for collection and/or analysis of bird eggs, upstream contamination dealt with through different administrative vehicle, upland parties fill data needs.

We believe that this framework lays out a framework to provide as much certainty to the LWG about the scope of Round 3B before July 1, 2007 while at the same time recognizing the actualities of the situation we are in.

We look forward to discussing this further at our meeting scheduled for May 30, 2007.

Thanks, Eric